

ORIGINAL

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¹ Interestingly, Defendant unreasonably opposed Plaintiff's request in the *Edwards* case to submit the sworn deposition testimony of Ronald Frank, a witness in both cases, who stated that the relevant decision maker, Joseph McCool, instructed Frank to inform Williams that he would jeopardize his career with the Turnpike if he continued to assist "that crazy fucking nigger" in reference to Edwards. How Defendants can in good faith logically square their inconsistent positions escapes Plaintiff's counsel; however, such is the nature of the fight against discrimination—both the employment action and the litigation strategies are built upon sheer "prejudice."

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. Ostrowski', written over a horizontal line.

Andrew J. Ostrowski, Esquire

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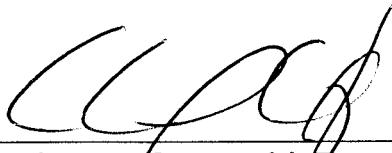
Attorney for Plaintiff

Dated: November 12, 2002

CERTIFICATE OF SERVICE

I, Andrew J. Ostrowski, Esquire, hereby certify that a true and correct copy of the Plaintiff's Response To Defendant's Supplemental Brief To Defendant's Motion For Summary Judgment was served on Defendant's counsel by first class mail, postage pre-paid, addressed as follows:

John C. Romeo, Esquire
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Andrew J. Ostrowski, Esquire

Dated: November 12, 2002